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Filing date: **09/21/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91206564
Party	Defendant Fire Tail Brands, LLC
Correspondence Address	JODY H. DRAKE SUGHRUE MION, PLLC 2100 PENNSYLVANIA AVE NW STE 800 WASHINGTON, DC 20037-3200 tm@sughrue.com
Submission	Answer
Filer's Name	Jody H. Drake
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Signature	/Jody H. Drake/
Date	09/21/2012
Attachments	S15728 Answer to Notice of Opposition.PDF (3 pages)(84276 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In re Application Serial No. 85/480,533
Mark: IMPERIAL JADE

SAZERAC NORTH AMERICA, INC.,

Opposer,

v.

FIRE TAIL BRANDS, LLC,

Applicant.

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Opposition No. 91206564

APPLICANT'S ANSWER TO NOTICE OF OPPOSITION

Applicant, by its attorney, hereby answers the allegations set forth in the Notice of Opposition as follows:

1. Applicant has insufficient knowledge or information upon which to form a belief as to truth of the allegations set forth in Numbered Paragraph 1 of the Notice of Opposition and, therefore, Applicant denies said allegations.

2. Applicant has insufficient knowledge or information upon which to form a belief as to truth of the allegations set forth in Numbered Paragraph 2 of the Notice of Opposition and, therefore, Applicant denies said allegations.

3. Applicant has insufficient knowledge or information upon which to form a belief as to truth of the allegations set forth in Numbered Paragraph 3 of the Notice of Opposition and, therefore, Applicant denies said allegations.

4. Applicant has insufficient knowledge or information upon which to form a belief as to truth of the allegations set forth in Numbered Paragraph 4 of the Notice of Opposition and, therefore, Applicant denies said allegations.

5. Applicant admits the allegations set forth in Numbered Paragraph 5 of the Notice of Opposition.

6. Applicant denies the allegations set forth in Numbered Paragraph 6 of the Notice of Opposition.

7. Applicant admits it has claimed a bona fide intent to use the IMPERIAL JADE mark, but denies the remaining allegations set forth in Numbered Paragraph 7 of the Notice of Opposition.

8. Applicant denies the allegations set forth in Numbered Paragraph 8 of the Notice of Opposition.

9. Applicant denies the allegations set forth in Numbered Paragraph 9 of the Notice of Opposition.

10. Applicant denies the allegations set forth in Numbered Paragraph 10 of the Notice of Opposition.

11. Applicant denies the allegations set forth in Numbered Paragraph 11 of the Notice of Opposition.

12. Applicant denies the allegations set forth in Numbered Paragraph 12 of the Notice of Opposition.


13. Applicant denies the allegations set forth in Numbered Paragraph 13 of the Notice of Opposition.

14. No response required.

WHEREFORE, Applicant prays that the opposition be dismissed with prejudice.

Respectfully submitted,
FIRE TAIL BRANDS, LLC

By: _____


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Attorneys for Applicant

Dated: September 21, 2012.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **APPLICANT'S ANSWER TO NOTICE OF OPPOSITION**, has been served on counsel for Opposer this 21st day of September, 2012, via email (hdnavarro@cooley.com; trademarks@cooley.com), and first class mail, postage prepaid, to:

Heather Dunn Navarro
Todd S. Bontemps
COOLEY LLP
777 6th Street, NW, Suite 1100
Washington, DC 20001


Valerie L. Mullineaux